



Emma Gilmore
Partner

March 14, 2022

VIA ECF

The Honorable Margo K. Brodie
Chief District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Courtroom 6F
Brooklyn, N.Y. 11201

Re: *Patel v. Koninklijke Philips N.V. et al.*, No. 21 Civ. 4606 (MKB) (E.D.N.Y.).

Dear Judge Brodie:

We represent Lead Plaintiff Richard Sun and Plaintiff Subhash Patel (“Plaintiffs”) in the above-referenced securities class action. We write with the consent of Defendants and pursuant to the Court’s March 5, 2022 Order directing the parties “to confer and file a proposed briefing schedule for Defendants’ motion to dismiss on or before March 15, 2022.”

On December 10, 2021, counsel for the parties filed a Joint Stipulation and [Proposed] Order regarding the filing of an amended complaint and proposing a briefing schedule for Defendants’ motion to dismiss. (ECF No. 13). On December 13, 2021, the Court entered the Stipulation and Order, accepting the parties’ proposed schedule. (ECF No. 14) (the “Scheduling Order”). Pursuant to the Scheduling Order, Plaintiffs’ Amended Complaint was due on January 3, 2022, Defendants’ motion to dismiss was due on March 4, 2022, Plaintiffs’ opposition is due on April 18, 2022, and Defendants’ reply is due on May 18, 2022. *Id.*

Consistent with the Scheduling Order, Plaintiffs timely filed their Amended Complaint on January 3, 2022 (ECF No. 16), and Defendants timely served their motion to dismiss on March 4, 2022.

As directed, the parties have conferred. The parties agree that the current Scheduling Order need not be modified. Accordingly, the parties respectfully submit that, consistent with the Scheduling Order, Plaintiffs’ opposition to Defendants’ motion to dismiss is due on April 18, 2022, and Defendants’ reply in further support of their motion to dismiss is due on May 18, 2022. Scheduling Order ¶ 3.



Respectfully submitted,

By: /s/ Emma Gilmore

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cc: All counsel of record (via ECF)